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17
18 UNITED STATES DISTRICT COURT
19 DISTRICT OF NEVADA

20 YUGA LABS, INC.,
21 Plaintiff,

22 v.

23 RYAN HICKMAN,
24 Defendant.

Case No.: 2:23-cv-00111-JCM-NJK

**DECLARATION OF KIMBERLY
CULP IN SUPPORT OF PLAINTIFF
YUGA LABS, INC.'S APPLICATION
FOR ENTRY OF DEFAULT
JUDGMENT AGAINST RYAN
HICKMAN**

1 I, Kimberly Culp, declare:

2 1. I am an attorney admitted *pro hac vice* in this case and am an attorney with the law
3 firm of Fenwick & West LLP, counsel for Plaintiff Yuga Labs, Inc. (“Plaintiff” or “Yuga Labs”) in the above-captioned matter. I make this declaration based on my own personal knowledge. If
4 called as a witness, I could testify competently to the facts set forth herein.
5

6 2. I submit this declaration in support of Plaintiff’s Application for Entry of Default
7 Judgment Against Ryan Hickman.

8 3. In September 2022, in the matter of *Yuga Labs, Inc. v. Ryder Ripps and Jeremy*
9 *Cahen*, Case No. 2:22-cv-04355-JFW-JEM (C.D. Cal.) (“*Ripps* matter”), my firm caused a
10 subpoena to be served on Mr. Hickman for documents. I am counsel of record in the *Ripps* matter.
11 Request No. 9 in that subpoena asked Mr. Hickman to produce “[d]ocuments sufficient to show
12 royalties you earned from the sale of RR/BAYC NFTs.”

13 4. On December 7, 2022, in the *Ripps* matter, I deposed Ryan Hickman regarding his
14 involvement in Mssrs. Ripps’ and Cahen’s commercialization of the infringing RR/BAYC NFT.
15 In particular, questioned Mr. Hickman regarding his work developing the rrbayc.com website, the
16 RRBAYCRSVP smart contract software, and the Ape Market. (Attached hereto as **Exhibit A** is a
17 true and correct copy of excerpts from that deposition.) I introduced Mr. Hickman’s responses to
18 the September 2022 subpoena as Exhibit 7 to his deposition. (Attached hereto as **Exhibit B** is a
19 true and correct copy of an excerpt from Exhibit 7 to Mr. Hickman’s deposition showing his
20 response to Request No. 9 in response to the September 2022 subpoena.) In response to Request
21 No. 9 to the September subpoena, Mr. Hickman responded that although he did not earn royalties,
22 he was paid to make the rrbayc.com website and RRBAYC RSVP smart contract software. Mr.
23 Hickman confirmed at his deposition that he was paid 15% of the proceeds of the sale of the
24 infringing RR/BAYC NFTs.

25 5. On March 26, 2023, I contacted Mr. Hickman at the same email he had used to
26 communicate with me previously, including in the days prior in relation to the *Ripps* matter. In my
27 March 26, email to Mr. Hickman, I notified him of this Court’s entry of default against him. I
28

1 attached to my email copies of the clerk's entry of default (ECF No. 21) and the Court's Order
2 granting Yuga Labs' motion for entry of default (ECF No. 20). Among other things, I notified Mr.
3 Hickman of Yuga Labs' intent to seek damages of \$193,863.70, its costs and attorneys' fees
4 (including its fees associated with bringing this motion for default judgment), and injunctive relief
5 through a motion for default judgment seeking such relief.

6 6. On March 28, 2023, Mr. Hickman responded to my March 26 email.

7 7. No resolution was reached as to this matter, and I informed Mr. Hickman of our
8 intent to move forward with our motion for default judgment.

9 I declare under penalty of perjury under the laws of the United States that the foregoing is
10 true and correct.

11 Executed on March 31, 2023.

12
13 /s/ Kimberly Culp
14 Kimberly Culp
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FENWICK & WEST LLP
ATTORNEYS AT LAW

EXHIBIT LIST

Exhibit No.	Description
A.	Excerpts from December 7, 2022 Deposition of Ryan Hickman
B.	Excerpt from Exhibit 7 to Mr. Hickman's deposition showing his response to Request No. 9 in response to the September 2022 subpoena

FENWICK & WEST LLP
ATTORNEYS AT LAW

Exhibit A

Exhibit A

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

YUGA LABS, INC.,)
)
Plaintiff,)
)
vs.) Case No.
) 2:22-cv-04355-JFW-JEM
RYDER RIPPS and JEREMY)
CAHEN,)
)
Defendants.)
_____)

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VIDEOTAPED DEPOSITION OF RYAN HICKMAN

Taken on Wednesday, December 7, 2022

By a Certified Stenographer and Legal Videographer

At 9:11 a.m.

At 9275 West Russell Road, Suite 240

Las Vegas, Nevada

Stenographically reported by:

Holly Larsen, NV CCR 680, CA CSR 12170

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12 The Legal Videographer:

13 SAMUEL CAMACHO

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P R O C E E D I N G S

-oOo-

THE VIDEOGRAPHER: Good morning. We are going on the record at 9:11 a.m., December 7, 2022.

Please note that the microphones are sensitive and may pick up whispering and private conversations. Please mute your phones at this time. Audio and video recording will continue to take place unless all parties agree to go off the record.

This is Media Unit 1 of the video-recorded deposition of Ryan Hickman taken by counsel for plaintiff in the matter of Yuga Labs, Inc., versus Ryder Ripps and Jeremy Cahen, filed in the United States District Court of the Central District of California, Case Number 2:22-CV-04355-JFW-JEM. The location of the deposition is 9275 West Russell Road, Suite 240, Las Vegas, Nevada.

My name is Samuel Camacho representing Veritext, and I am the videographer. The court reporter is Holly Larsen from the firm Veritext.

I am not authorized to administer an oath, I am not related to any party in this action,

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1 nor am I financially interested in the outcome. If
2 there are any objections to proceeding, please state
3 them at the time of your appearance.

4 Counsel and all present, including
5 remotely, will now state their appearances and
6 affiliations for the record, beginning with the
7 noticing attorney.

8 MS. CULP: Good morning. I'm Kimberly
9 Culp with the law firm Fenwick & West representing
10 Yuga Labs.

11 MR. FARES: Good morning. I'm Anthony
12 Fares with the law firm Fenwick & West representing
13 Yuga Labs.

14 MR. GOSMA: This is Derek Gosma of
15 WilmerHale representing the Defendants, Mr. Ripps
16 and Mr. Cahen.

17 THE VIDEOGRAPHER: Will the court
18 reporter please swear in the witness and counsel may
19 proceed.

20 Whereupon,

21 RYAN HICKMAN,
22 having been first duly sworn to testify to the
23 truth, was examined, and testified as follows:

24 ///

25 ///

1 with a, I believe, PDF of the information that I
2 collected.

3 Q. We will look at that document in a
4 moment, but let me try a different question.

5 Does Exhibit 6, if you look at the dates
6 and compare them between Exhibit 5 and Exhibit 6,
7 refresh your recollection that by October 12th you
8 were aware that Fenwick & West had taken the
9 position that the documents you had already provided
10 didn't sufficiently comply with the subpoena?

11 A. Say that again, please.

12 MS. CULP: Madam Court Reporter, can you
13 read back the question.

14 (The question was read.)

15 THE WITNESS: I see. So I haven't seen
16 these emails or read these emails. So the -- yeah,
17 I haven't -- the emails that I didn't respond to are
18 emails that I have never read before.

19 BY MS. CULP:

20 Q. You received but did not open in your
21 inbox; correct?

22 A. Correct.

23 MS. CULP: Next in order is Exhibit 7.

24 (Exhibit 7 marked.)

25 ///

1 BY MS. CULP:

2 Q. You had just mentioned an email that you
3 sent with your documents. Is that Exhibit 7 that
4 we've just put in front of you?

5 A. Correct.

6 Q. And that was the production that you
7 made in response to the September subpoena which is
8 Exhibit 2?

9 A. Correct.

10 Q. I want to go back to Exhibit 1. I know
11 you're starting to accumulate the pile I warned you
12 of. If you can find Exhibit 1 and get that in front
13 of you.

14 A. Yes, I have it in front of me.

15 Q. Do you have Exhibit 1 in front of you?

16 A. Yes.

17 Q. Thank you. Can you please go to
18 Attachment A. And the pages in Attachment A are
19 numbered. I'd like you to turn to numbered page 6
20 of Attachment A to Exhibit 1. Numbered page 6.

21 A. Page 6.

22 Q. Are you there?

23 A. Yes, I am.

24 Q. Do you see Document Request Number 1?

25 A. Yes.

1 Q. What do you understand Document Request
2 Number 1 to be seeking from you?

3 A. Some way for me to export information
4 from Discord and provide it.

5 Q. Were there communications on Discord
6 that relate to RR/BAYC NFTs, BAYC NFTs, or Yuga
7 Labs?

8 A. Yes.

9 Q. I guess let's establish just some
10 definitions. I think we're communicating with each
11 other, but let's just make sure.

12 When I say "RR/BAYC NFTs," what do you
13 understand?

14 A. I understand the specific contract
15 address on the Ethereum blockchain for that project.

16 Q. And that project was called RR/BAYC NFT
17 to sort of the public if you will?

18 A. Correct.

19 Q. And if I say "BAYC NFTs," what do those
20 refer to?

21 A. A specific contract address on the
22 Ethereum blockchain.

23 Q. And those are Bored Ape Yacht Club NFTs
24 that were created by my client, Yuga Labs?

25 A. Correct.

1 Q. So you understand BAYC, the letters, to
2 be the acronym for Bored Ape Yacht Club?

3 A. Correct.

4 Q. And do you know who Yuga Labs is?

5 A. Yes, I do.

6 Q. Okay. And you understand Yuga Labs to
7 be the business behind Bored Ape Yacht Club?

8 A. Yes, I understand that.

9 Q. So going back to Request Number 1 that's
10 on page 6 of Attachment A to Exhibit 1, there were
11 Discord communications that you were a party to that
12 related to, you know, one or all of the things that
13 are listed here?

14 A. Yes.

15 Q. Tell me what those Discord
16 communications were in terms of the channel, if the
17 channel had a name, or to whom you might have been
18 communicating with if it was a one-to-one
19 communication.

20 A. There were communications with the
21 creator, the development team, and -- so myself,
22 Tom, Jeremy, and Ryder had a channel. I believe it
23 had a name. I'm not certain if it had a name, but
24 it was a group chat.

25 Then myself and Tom had a group chat, a

1 THE VIDEOGRAPHER: Going off the record
2 at 12:18 p.m.

3 (The lunch break was taken.)

4 THE VIDEOGRAPHER: We're back on the
5 record. Time is 1:07 p.m.

6 BY MS. CULP:

7 Q. So we're getting the next exhibit in
8 order, Mr. Hickman. You're still under oath even
9 though we took a lengthy lunch break. Just like
10 with all our breaks, the court reporter is not going
11 to administer the oath every time.

12 So do you understand that?

13 A. I understand that.

14 Q. Thanks. We were talking about your
15 initial conversations before the development process
16 began with respect to the tool to solve the
17 bottleneck issue and also the Ape Market. And I had
18 some questions about the financial arrangement, and
19 I just want to continue to talk about the financial
20 arrangement real quick.

21 MS. CULP: This will be next in order.

22 (Exhibit 21 marked.)

23 BY MS. CULP:

24 Q. So Exhibit 21 is in front of you. This
25 is another grab from Discord, the Team Ape Market

1 Discord. You can see Mr. Cahen's message in the
2 middle of this on the 19th of May at 10:46 a.m.

3 Do you see that message?

4 A. 10:46 a.m., yes.

5 Q. And then a few lines down, "And
6 @middlesmarch" -- which is Mr. Lehman -- "writer has
7 agreed to offer Hwonder" -- which is you --

8 A. Uh-huh.

9 Q. -- "the exact same partnership as us."
10 Do you see that?

11 A. Yes.

12 Q. He goes on. "So we are all equally
13 incentivized 15 percent of mint plus 15 percent of
14 Ryder's share of royalties."

15 Do you see that?

16 A. Yes.

17 Q. Was that the ultimate financial terms
18 that the four of you came together around for your
19 work on the RSVP contract?

20 A. It is the right financial arrangement.
21 I'm not certain of -- not really aware of
22 understanding it as, like, a business partnership.
23 But definitely being compensated 15 percent of the
24 proceeds and -- so yes.

25 Q. And I want to unpack that so I'm

1 understanding your testimony.

2 That economic arrangement here is
3 consistent with the arrangement that the four of you
4 reached?

5 A. Correct.

6 Q. But I also understand your testimony
7 that it sounds like you did not have an
8 understanding that there was a partnership formed
9 between the four of you; is that correct?

10 A. Very correct.

11 Q. Did you understand -- did you have any
12 understanding if there was any legal relationship
13 between you and Mr. Ripps and Mr. Cahen and
14 Mr. Lehman in this context?

15 A. Not at all.

16 Q. There's a reference to 15 percent of
17 Ryder's share of royalties. Can you explain what
18 that refers to; particularly, the relationship of
19 royalties? Like, what did you understand
20 "royalties" to mean here?

21 A. I believe -- I'm not a hundred percent
22 certain, but I believe the foundation contract
23 forces a royalty payment. I'm not a hundred
24 percent. But I believe that that contract does
25 that.

1 Q. The foundation contract for the
2 RR/BAYC NFT?

3 A. Correct.

4 Q. You can turn back to what you had
5 produced to us that's Exhibit 7.

6 A. Bear with me. Yes.

7 Q. It's your response to Document Request
8 Number 9, if you can turn to that one. We're on the
9 same page. So Exhibit 7, and then Document
10 Request 9. It looks like you were at 6.

11 Do you see Document Request 9?

12 A. Yes.

13 Q. You write, "I earned zero royalties."

14 Can you help me unpack how you're using
15 "royalties" in your response here versus how
16 Mr. Cahen is using "royalties" in Exhibit 21?

17 Are the terms being used the same way,
18 or is there different language being used by you in
19 the one document and Mr. Cahen in the other?

20 A. I don't specifically know what
21 "royalties" mean here. It says "Ryder's share of
22 royalties." The project is zero percent royalties.
23 I'm only making a guess that it's referring to the
24 foundation contract that forces the royalties.

25 In this reference I'm specifically

1 stating that I'm a developer. I make software. I
2 charge to make software. I have a record, a
3 history, of charging to make the software. My
4 financial arrangement for this whole thing is about
5 as a software developer being compensated for making
6 software.

7 Q. Your records show your sort of net
8 payment was 142.35 ETH?

9 A. Yes.

10 Q. Do you recall what that translated to
11 into dollars when you made the withdrawals?

12 A. I never actually withdrew those funds.
13 That wallet was compromised.

14 Q. Can you explain that? What do you mean,
15 "that wallet was compromised"?

16 A. I was developing something else, and I
17 had a lot going on. I installed a package. It's a
18 support software. And the package had a rat in it.
19 A rat is a type of -- it's not a virus, but it's
20 hidden malicious code that took the private keys
21 from the deployment and took this and a whole lot
22 more.

23 Q. The ETH out of your wallet?

24 A. Out of that wallet, yes.

25 Q. So the 142.35 ETH was transferred to you

1 and then stolen by somebody from that wallet?

2 A. Correct.

3 Q. Understood.

4 (Exhibit 22 marked.)

5 BY MS. CULP:

6 Q. Exhibit 22 has been placed in front of
7 you. At the middle of 22 you'll see that Mr. Lehman
8 writes on the 20th of May at 7:09 a.m., "There's the
9 foundation royalties, though, when this sells on
10 their marketplace."

11 A. I see.

12 Q. Is that consistent with your testimony
13 that there were royalties built into the Foundation
14 contract for the RR/BAYC NFTs?

15 A. There's not royalties in the Foundation
16 NFT ERC 721 contract.

17 The Foundations are on -- the royalties
18 are automatically enforced on Foundation's
19 marketplace, which is a separate thing. And people
20 who get the NFT choose where they want to sell it on
21 a secondary market. It could include Foundation.
22 So when it sold on Foundation, it produces a
23 royalty.

24 Q. Understood.

25 A. But I don't know if that's what he's

1 order, and the protective order affords a third
2 party the right to designate their documents as
3 confidential. My suggestion is we take this offline
4 and off the record. We'll need to meet and confer
5 with that third party as to whether or not they will
6 de-designate their documents. Then let's have that
7 broader conversation, because it impacts the
8 designation of this deposition.

9 MR. GOSMA: Understood. With that, I
10 have nothing further. From my perspective, we can
11 go off the record.

12 MS. CULP: From mine as well.

13 THE WITNESS: I had a quick question.

14 MR. GOSMA: Sure. We can answer it on
15 the record, I suppose.

16 THE WITNESS: Am I allowed to have a
17 copy of this?

18 MR. GOSMA: Yes, you will be able to get
19 a copy of it.

20 THE WITNESS: Thank you.

21 THE VIDEOGRAPHER: And this concludes
22 the deposition. We're going off the record at
23 6:27 p.m., and this concludes today's testimony
24 given by Ryan Hickman. The total number of media
25 used was eight and will be retained by Veritext.

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1 Thank you.

2 (Proceedings concluded at 6:27 p.m.)

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CERTIFICATE OF REPORTER

STATE OF NEVADA)
)SS

COUNTY OF CLARK)

I, Holly Larsen, a duly certified court reporter licensed in and for the State of Nevada, do hereby certify:

That I reported the taking of the deposition of the witness, Ryan Hickman, at the time and place aforesaid;

That prior to being examined, the witness was by me duly sworn to testify to the truth, the whole truth, and nothing but the truth;

That I thereafter transcribed my shorthand notes into typewriting and that the typewritten transcript of said deposition is a complete, true, and accurate record of testimony provided by the witness at said time to the best of my ability.

I further certify (1) that I am not a relative or employee of counsel of any of the parties; nor a relative or employee of the parties involved in said action; nor a person financially interested in the action; nor do I have any other relationship with any of the parties or with counsel of any of the parties involved in the action that may reasonably cause my impartiality to be questioned; and (2) that transcript review pursuant to FRCP 30(e) was requested.

IN WITNESS HEREOF, I have hereunto set my hand in the County of Clark, State of Nevada, this 21st day of December, 2022.



HOLLY LARSEN, CCR NO. 680

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ERRATA SHEET

I declare under penalty of perjury that I have read the foregoing _____ pages of my testimony, taken on _____ (date) at _____ (city), _____ (state), and that the same is a true record of the testimony given by me at the time and place herein above set forth, with the following exceptions:

Page	Line	Should read:	Reason for change:
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ERRATA SHEET (Continued)

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Date: _____

Signature of Witness

Name Typed or Printed

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RYAN HICKMAN

260 Sidewinder Street, Henderson, NV 89012

DECEMBER 21, 2022

RE: YUGA LABS, INC. v. RYDER RIPPS

DECEMBER 7, 2022, RYAN HICKMAN, JOB NO. 5597850

The above-referenced transcript has been
completed by Veritext Legal Solutions and
review of the transcript is being handled as follows:

___ Per CA State Code (CCP 2025.520 (a)-(e)) - Contact Veritext
to schedule a time to review the original transcript at
a Veritext office.

___ Per CA State Code (CCP 2025.520 (a)-(e)) - Locked .PDF
Transcript - The witness should review the transcript and
make any necessary corrections on the errata pages included
below, notating the page and line number of the corrections.
The witness should then sign and date the errata and penalty
of perjury pages and return the completed pages to all
appearing counsel within the period of time determined at
the deposition or provided by the Code of Civil Procedure.

___ Waiving the CA Code of Civil Procedure per Stipulation of
Counsel - Original transcript to be released for signature
as determined at the deposition.

___ Signature Waived - Reading & Signature was waived at the
time of the deposition.

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1 _X_Federal R&S Requested (FRCP 30(e)(1)(B)) - Locked .PDF

2 Transcript - The witness should review the transcript and
3 make any necessary corrections on the errata pages included
4 below, notating the page and line number of the corrections.
5 The witness should then sign and date the errata and penalty
6 of perjury pages and return the completed pages to all
7 appearing counsel within the period of time determined at
8 the deposition or provided by the Federal Rules.

9 ___ Federal R&S Not Requested - Reading & Signature was not
10 requested before the completion of the deposition.

CONFIDENTIAL

1 YUGA LABS, INC. v. RYDER RIPPS

2 RYAN HICKMAN, JOB NO. 5597850

3 E R R A T A S H E E T

4 PAGE_____ LINE_____ CHANGE_____

5 _____

6 REASON_____

7 PAGE_____ LINE_____ CHANGE_____

8 _____

9 REASON_____

10 PAGE_____ LINE_____ CHANGE_____

11 _____

12 REASON_____

13 PAGE_____ LINE_____ CHANGE_____

14 _____

15 REASON_____

16 PAGE_____ LINE_____ CHANGE_____

17 _____

18 REASON_____

19 PAGE_____ LINE_____ CHANGE_____

20 _____

21 REASON_____

22 _____

23 _____

24 WITNESS _____ Date _____

25 _____

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Exhibit B

Exhibit B

Document Request 9

I earned zero royalties. There are no documents associated to any royalties. I was compensated for the development of a token reservation system. The gross total 158.28 ETH:

Sender	Amount	Latest Date
0xee969b688442c2d58...	158.28 ETH \$218144.53	2022-06-25
Of which 15.93 ETH was returned for gas cost:		
0x592814ff14e030b51f6...	15.93 ETH \$26280.83	2022-07-27

Net to build reservation system: 142.35 ETH